

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Wikimedia Foundation, et al.,

Plaintiff(s)

v.

National Security Agency / Central Security Service, et al.,

Defendant(s)

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Case No.: 1:15-cv-00662-RDB

MOTION FOR ADMISSION *PRO HAC VICE*

I, David Rocah, am a member in good standing of the bar of this Court.

My bar number is Bar No. 27315. I am moving the admission of Ashley Gorski
to appear *pro hac vice* in this case as counsel for Plaintiffs.

We certify that:

1. The proposed admittee is not a member of the Maryland bar and does not maintain any law office in Maryland
2. The proposed admittee is a member in good standing of the bars of the following State Courts and/or United States Courts:

State Court & Date of Admission

U.S. Court & Date of Admission

State of New York (March 30, 2011)

U.S. District Court for the Eastern
District of New York (September 19,
2013)

U.S. District Court for the Southern
District of New York (August 20, 2013)

3. During the twelve months immediately preceding this motion, the proposed admittee has been admitted *pro hac vice* in this Court 0 times.

4. The proposed admittee has never been disbarred, suspended, or denied admission to practice law in any jurisdiction. (NOTE: If the proposed admittee has been disbarred, suspended, or denied admission to practice law in any jurisdiction, then he/she must submit a statement fully explaining all relevant facts.)

5. The proposed admittee is familiar with the Maryland Lawyers' Rules of Professional Conduct, the Federal Rules of Civil Procedure, the Federal Rules of Evidence, the Federal Rules of Appellate

Procedure, and the Local Rules of this Court, and understands he/she shall be subject to the disciplinary jurisdiction of this Court.

6. The proposed admittee understands admission *pro hac vice* is for this case only and does not constitute formal admission to the bar of this Court.

7. Either the undersigned movant or [n/a], is also a member of the bar of this Court in good standing, and will serve as co-counsel in these proceedings.

8. **The \$50.00 fee for admission *pro hac vice* accompanies this motion.**

9. We hereby certify under penalties of perjury that the foregoing statements are true and correct.

Respectfully submitted,

MOVANT

/s/ David Rocah
Signature

David Rocah
Printed Name

American Civil Liberties Union
Foundation of Maryland
Firm

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PROPOSED ADMITTEE

/s/ Ashley Gorski
Signature

Ashley Gorski
Printed Name

American Civil Liberties Union
Foundation
Firm

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